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Attorneys for Plaintiff  
VERIGY US, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

VERIGY US, INC, a Delaware Corporation,

Plaintiff,

vs.

ROMI OMAR MAYDER, an individual;  
WESLEY MAYDER, an individual; SILICON  
TEST SYSTEMS, INC., a California Corporation;  
and SILICON TEST SOLUTIONS, LLC, a  
California Limited Liability Corporation,  
inclusive,

Defendants.

Case No. C07 04330 RMW (HRL)

**VERIGY'S AMENDED NOTICE OF  
MOTION AND MOTION FOR  
PROTECTIVE ORDER RELIEVING  
VERIGY OF DUTY TO RESPOND  
FURTHER TO SECOND AMENDED  
NOTICE OF RULE 30(b)(6) DEPOSITION  
PROPOUNDED BY DEFENDANTS;  
[Fed.R.Civ.P. 26(c)(1) and 37]**

Date: October 14, 2008  
Time: 10 a.m.  
Ctrm.: 2, 5th Floor  
Judge: Hon. Howard R. Lloyd

Complaint Filed: August 22, 2007  
Trial Date: None Set

AND RELATED CROSS-ACTIONS

**AMENDED NOTICE OF MOTION AND MOTION**

TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE AMENDED NOTICE that, on Tuesday, October 14, 2008, at 10:00 a.m., or as soon thereafter as the matter may be heard, before the Hon. Howard R. Lloyd, United States Magistrate Judge, Courtroom 2, 5th Floor, of the United States District Court for the Northern District of California, San Jose Division, 280 South First Street, San Jose, California, plaintiff Verigy U.S., Inc. ("Verigy"), shall and hereby does move the Court for a protective order relieving Verigy of the duty to respond further to Defendants' Second Amended Notice of Rule 30(b)(6) Deposition of Verigy US, Inc. ("Second Amended Depo Notice") except insofar as Verigy has already agreed to produce a corporate witness on certain topics in the Second Amended Notice, subject to objections.

The motion is made pursuant to Rules 26(c)(1) and 37 of the Federal Rules of Civil Procedure on the grounds that good cause exists for issuance of an order forbidding the aforementioned deposition questioning on certain topics to protect Verigy from annoyance, oppression, harassment, undue burden and expense.

The motion is based upon this notice of motion and motion, the supporting memorandum of points and authorities, the declaration of Michael W. Stebbins, the complete files and records in this action, and such additional evidence and argument as may hereinafter be presented.

Dated: September 8, 2008

BERGESON, LLP

By:                     /s/                      
Melinda M. Morton

Attorneys for Plaintiff  
VERIGY US, INC.